

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEON WEINGRAD,

Plaintiff,

v.

POSIGEN DEVELOPER, LLC,

Defendant.

CIVIL ACTION NO. 2:24-CV-06503-GJP

**UNITED STATES DISTRICT JUDGE
GERALD J. PAPPERT**

**DEFENDANT POSIGEN DEVELOPER, LLC'S
CONSENT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

AND NOW comes Defendant POSIGEN DEVELOPER, LLC, referred to as Defendant, by and through its counsel Gordon Rees Scully Mansukhani, LLP, and, pursuant to Federal Rule of Civil Procedure 6(b), files the within Motion to Extend Time, respectfully averring as follows:

1. Defendant was served with the Complaint on December 9, 2024.
2. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant's response to the Complaint is due on December 30, 2024.
3. On or about December 16, 2024, Defendant retained the law firm of Gordon Rees Scully Mansukhani, LLP to represent its interests in this matter.
4. Counsel for the Defendant requires additional time to investigate the allegations of the Complaint, to confer with its client to gather and organize background information regarding the case and prepare a responsive pleading, motion and/or request. Additionally, the Court will be closed for Christmas holiday.
5. No prejudice will result from the extension of time sought herein, and no rights of Plaintiff will be diminished as a result of this brief extension.
6. Defendant's counsel conferred with Plaintiff's counsel, and Plaintiff's counsel

consents to the requested extension.

WHEREFORE, Defendant respectfully requests that this Court enter the above proposed Order granting Defendant's motion for a thirty-date extension of time and providing Defendant until January 29, 2025, to respond to the Complaint.

Dated: December 23, 2024

By: /s/ Jessica G. Lucas
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